

The Honorable John E. Bridges

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
IN AND FOR THE COUNTY OF CHELAN

TIMOTHY BORDERS et al.,

Petitioners,

v.

KING COUNTY et al.,

Respondents.

and

Washington State Democratic Central  
Committee,

Intervenor-Respondent,

and

Libertarian Party of Washington State et al.,

Intervenor-Respondents.

No. 05-2-00027-3

**SUBPOENA DUCES TECUM**

STATE OF WASHINGTON

To: **Curt Wyrick, Esq.**  
Clark County Prosecuting Attorney's Office  
P.O. Box 5000  
Vancouver, WA 98666-5000  
FAX: (360) 397-2230

SUBPOENA DUCES TECUM - 1

SEA 1633180v1 55441-4

Davis Wright Tremaine LLP  
LAW OFFICES  
2600 Century Square · 1501 Fourth Avenue  
Seattle, Washington 98101-1688  
(206) 622-3150 · Fax: (206) 628-7699

1 GREETINGS:

2 YOU ARE HEREBY COMMANDED to be and appear as follows:

3 PLACE: Offices of Davis Wright Tremain LLP  
4 1501 4<sup>th</sup> Avenue, Suite 2600  
5 Seattle, WA 98101

6 DATE: Wednesday, April 20, 2005

7 TIME: 9:00 a.m. PST

8 To produce and permit inspection and copying of the documents or objects in  
9 accordance with attached Attachment A at the place, date, and time specified above, at the  
10 request of the Petitioners in the above-entitled cause. If documents or objects are received  
11 at the above specified location by the specified date and time, your attendance is waived.

12 DATED this 13<sup>th</sup> day of April, 2005.

13 Davis Wright Tremain LLP  
14 Attorneys for Petitioners

15 By   
16 \_\_\_\_\_

17 Harry J.F. Korrell, WSBA #23173  
18 Robert J. Maguire, WSBA #29909  
19 1501 Fourth Avenue, Suite 2600  
20 Seattle, Washington 98101-1688  
21 Telephone: (206) 622-3150  
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26  
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## **ATTACHMENT "A"**

### **I. DEFINITIONS**

"Document" means, without limiting without limiting its generality, the original (or a copy when the original is not available) and each non identical copy (including those which are non identical by reason of notations and markings) of papers, writings and records of any nature whatsoever, including, but not limited to, electronic mail messages, contracts, agreements, correspondence, letters, telegrams, wires, cables, reports, schedules, diaries, statements, photographs, reproductions, maps, surveys, plats, drawings, blueprints, sketches, charts, models, invoices, purchase orders, ledgers, journals, checks, check stubs, notes, estimates, summaries, desk calendars, work papers, studies, appointment books, time sheets, logs, inventories, printouts, computer tapes, tape recordings, video recordings, microfilm, microfiche, recordings, or other data compilations from which information can be' obtained through detection devices into reasonably usable form, minutes of meetings, memoranda, including intercorporate, intracorporate, interoffice and intraoffice memoranda, memoranda regarding conferences, conversations or telephone conversations and any and all written, printed, typed, punched, or recorded matter of whatsoever kind of description, including drafts of any of the foregoing, as well as any computer disks, computer files, computer hard drives, computer backup tapes, archival media, or other electronic data, document or message storage of any kind or nature (whether on a disk, hard drive, file server, personal computer or other medium).

"You" or "your agents, servants, employees, attorneys, or representatives" includes but is not limited to all persons, professionals and/or associates, legal assistants and/or support staff who performed work as part of your team or under your supervision or at your direction in connection with the topics identified in this subpoena.

## II. INSTRUCTIONS

1. Please produce all the documents, described below, wherever located, which are in the possession, custody or control of you or any of your agents, servants, employees, attorneys, or representatives.

2. Any copy of a document that varies in any way from the original or from any other copy of the document, whether by reason of handwritten or other notation or any omission, shall constitute a separate document and must be produced.

3. The original of each document requested is to be produced. Each document requested is also to be produced for inspection in its original file folder, file jacket, or cover.

4. Documents are to be produced in such a fashion that the specific individual or entity from whom they were obtained can be readily determined.

5. If you do not produce any document herein requested under a claim of privilege, work product, or other ground of non production, please submit in lieu of such document a written statement which:

- (a) specifies the privilege, work product, or other asserted ground of non-production;
- (b) describes the nature and general topic of the documents to the extent possible in a manner consistent with the privilege, work product, or other asserted ground of non production;
- (c) identifies the person or persons who prepared the documents and, if applicable, the person or persons to whom the document was sent;
- (d) identifies each other person who has seen or had possession of the documents; and

- (e) specifies the date on which the document was prepared by the author and/or received by the addressees.

6. If any document was, but no longer is, in your custody or control, state whether it has been lost, destroyed, transferred, or otherwise disposed of, and in each instance, identify the document as completely as possible, including without limitation, the author(s), addressee(s), any person(s) who saw the document, the date of the document and date when the document was received, the subject matter of the document, and the circumstances surrounding the disposition of the document and the date that disposition occurred.

### **III. DOCUMENTS REQUESTED**

Produce for inspection and copying:

1. All records reflecting or referring to the restoration of civil rights of those convicted felons listed on the attached Exhibit 1,
2. All records reflecting or referring to civil rights *not* having been restored to such convicted felons listed on the attached Exhibit 1.

# EXHIBIT 1

Voter ID	Last	First	MI	Suffix
4804891	ASHBY	JUSTIN	H	
4160743	BONNEPRIS	DOUGLAS	J	
4376610	BYERS	RICHARD	M	
4713142	CHRISTMAN	DAVID		
4173251	CLARK	GREGORY	W	
4036201	CLARK	MARIE		
4200546	COFFIELD	CAREN		
4720131	COLLUM	BRANDI	J	
4399295	ENGH	FRED		
4790548	FARLESS	CHARLES	K	
3730241	FOREST	DANA		
2518991	FULWIDER	RHETT		
2684363	GRAY	JEFFREY	M	
3008649	HAMMOND	WILLIAM	C	
4043833	HARFORD	RICHARD		
4439502	JASSO	STEPHEN	J	
4192312	LEGETTE	CHESA		
4474446	MEREDITH	BRUCE	K	
4168884	NAPIER	JEFFREY	D	
4346182	OTTO	LARRY		
4304466	PATRIDGE	RYAN		
4559767	PETERS	SHANE	A	
4123074	RHINEHART	KEITH		
3907429	RICK	PAMELA		
4717237	ROBINSON	BERT		
4227841	RUSSELL	DENNIS	B	
4654006	SEVERSON	MICHAEL		
4710982	TAUFER	GREGORY		
4808654	TRAVIS	ANGELIQUE		
4194199	VALENTI	ANTHONY	N	
4636982	VOYLES	MITCHELL	L	
4808715	WESTERMA	JEREMY		
4152795	WOOBANK	CHRISTY		